
**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

In Re:)	
)	
TRI FUND DEVELOPMENT, LLC.,)	NO. 15-04492
Debtor)	
)	Chapter 11
)	
)	Honorable Judge Janet S. Baer

NOTICE OF MOTION

TO: See Attached Certificate of Service

PLEASE TAKE NOTICE that on March 9, 2014, at 09:30 AM, the undersigned will appear before the Honorable Janet S. Baer at the Dirksen Federal Building, located at 219 S. Dearborn, Courtroom 615, Chicago, Illinois and will then and there present the attached MOTION TO EMPLOY ATTORNEYS AHMAD T. SULAIMAN, MOHAMMED O. BADWAN, PAUL M. BACH and PENELOPE N. BACH, at which time you may appear if you so choose.

**BY: S/PAUL M. BACH, OF COUNSEL
SULAIMAN LAW GROUP, LTD
COUNSEL FOR DEBTOR(S)
900 JORIE BOULEVARD, SUITE 150
OAK BROOK, IL 60523
PHONE: (630) 575-8181
FAX: (630) 575-8188
ATTORNEY NO: 6209530**

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MOTION TO EMPLOY ATTORNEYS AHMAD T. SULAIMAN, MOHAMMED O.
BADWAN, PAUL M. BACH and PENELOPE N. BACH

NOW COME the Debtor, TRI FUND DEVELOPMENT, LLC by and through its attorneys Ahmad Sulaiman, Mohammed O. Badwan, Paul M. Bach and PENELOPE N. BACH of Sulaiman Law Group, Ltd. and move this Honorable Court for authority to retain counsel, and in support thereof state as follows:

1. The Debtor filed a voluntary Chapter 11 petition on February 11, 2015.
2. Applicant requires the assistance of counsel to represent the Debtor in matters concerning negotiations with creditors, preparation of a plan and disclosures statement, examining and resolving claims filed against the estate, preparation and prosecution of adversary matters, and otherwise to represent Debtor in matters before this Court. The Debtor is not experienced in Chapter 11 matters and require the expertise of counsel.

3. It is in the best interest of this estate and its economical administration that Ahmad Sulaiman, Mohammed Badwan, Paul M. Bachand PENELOPE N. BACH of Sulaiman Law Group, Ltd. be authorized to act as attorneys for the Debtor.
4. Each of the attorneys and firms listed above are attorneys at law duly admitted to practice before this Court and other necessary state and federal courts in this area and each has a particular expertise with regard to bankruptcy, corporate reorganization and debtor/creditor matters in cases under the Bankruptcy Code.
5. The normal billing rates for attorneys Ahmad Sulaiman, Mohammed Badwan, Paul M. Bach and Penelope N. Bach at Sulaiman Law Group, Ltd. for this matter is \$425.00 per hour. The Debtor prior to filing paid \$15,000.00 as a retainer including the filing fee of \$1,717.00. The amount of \$0.00 was paid for pre-petition work performed leaving a retainer of \$13,283.00.
6. It is contemplated that each of the attorneys on behalf of Sulaiman Law Group, Ltd will seek compensation based upon normal and usual billing rates. It is further contemplated that said law firms will seek interim compensation as permitted by 11 USC 331.

WHEREFORE the Debtor, Tri Fund Development, LLC prays that Ahmad Sulaiman, Mohammed Badwan, Paul M. Bach and PENELOPE N. BACH of Sulaiman Law Group, Ltd. be authorized to act as attorneys for the Debtor with compensation effective February 11, 2015 for such legal services to be paid as an administrative

expense in such amounts as the Court may hereafter determine and allow and for any further relief that this court deems just.

Respectively Submitted,
Tri Fund Development, LLC

By: /s/ Paul M. Bach

Mr. Paul M. Bach, Esq., Of Counsel
Ms. Penelope N. Bach, Of Counsel
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